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8 UNITED STATES DISTRICT COURT
9 CENTRAL DISTRICT OF CALIFORNIA
10 SOUTHERN DIVISION

11 CRAIG CUNNINGHAM,

12 Plaintiff,

13 v.

14 PERFORMANCE SLC LLC,
15 PERFORMANCE SETTLEMENT
16 LLC, DANIEL J. CRENSHAW, and
17 DOES 1-10,

18 Defendants.
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Case No. 8:18-cv-01093-AG-AGR

**JOINT AGENDA FOR
DISCOVERY
TELECONFERENCE**

Date: June 11, 2019

Time: 2 p.m.

Judge: Hon. Alicia G. Rosenberg

Location: Telephonic

Action Filed: June 20, 2018

Discovery Fact Cut-Off: May 20,
2019

Final Pre-Trial Conference: August
5, 2019

Jury Trial: August 20, 2019

1 Plaintiff and all Defendants, through their undersigned counsel, hereby
2 respectfully submit this joint agenda for the discovery teleconference:

- 3 1. How to handle Defendants' refusal to (1) search their ESI for proposed
4 keywords and produce responsive documents along with a supplemental
5 discovery response memorializing the same, or (2) engage in an iterative
6 process regarding keywords and hit counts.
- 7 2. Whether the entity defendants should produce documents relating to the
8 adequacy of their capitalization, in particular, their 2015 and 2017
9 income statement and balance sheet.
- 10 3. Allocation of costs of the second deposition of Defendant Daniel J.
11 Crenshaw.
- 12 4. Whether to allow Defendant Performance SLC LLC to withdraw its
13 admissions of the requests for admission served by Plaintiff.
14

15 The CM/ECF user filing this document attests that concurrence in its filing
16 has been obtained from its other signatory.

17
18 RESPECTFULLY SUBMITTED AND DATED on June 10, 19.

19 By: s/ Jon Fougner
20 Attorney for Plaintiff Craig Cunningham
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22 By: s/ Jeremy E. Branch
23 Attorney for Defendants Performance SLC,
24 LLC, Performance Settlement, LLC, and
25 Daniel J. Crenshaw
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